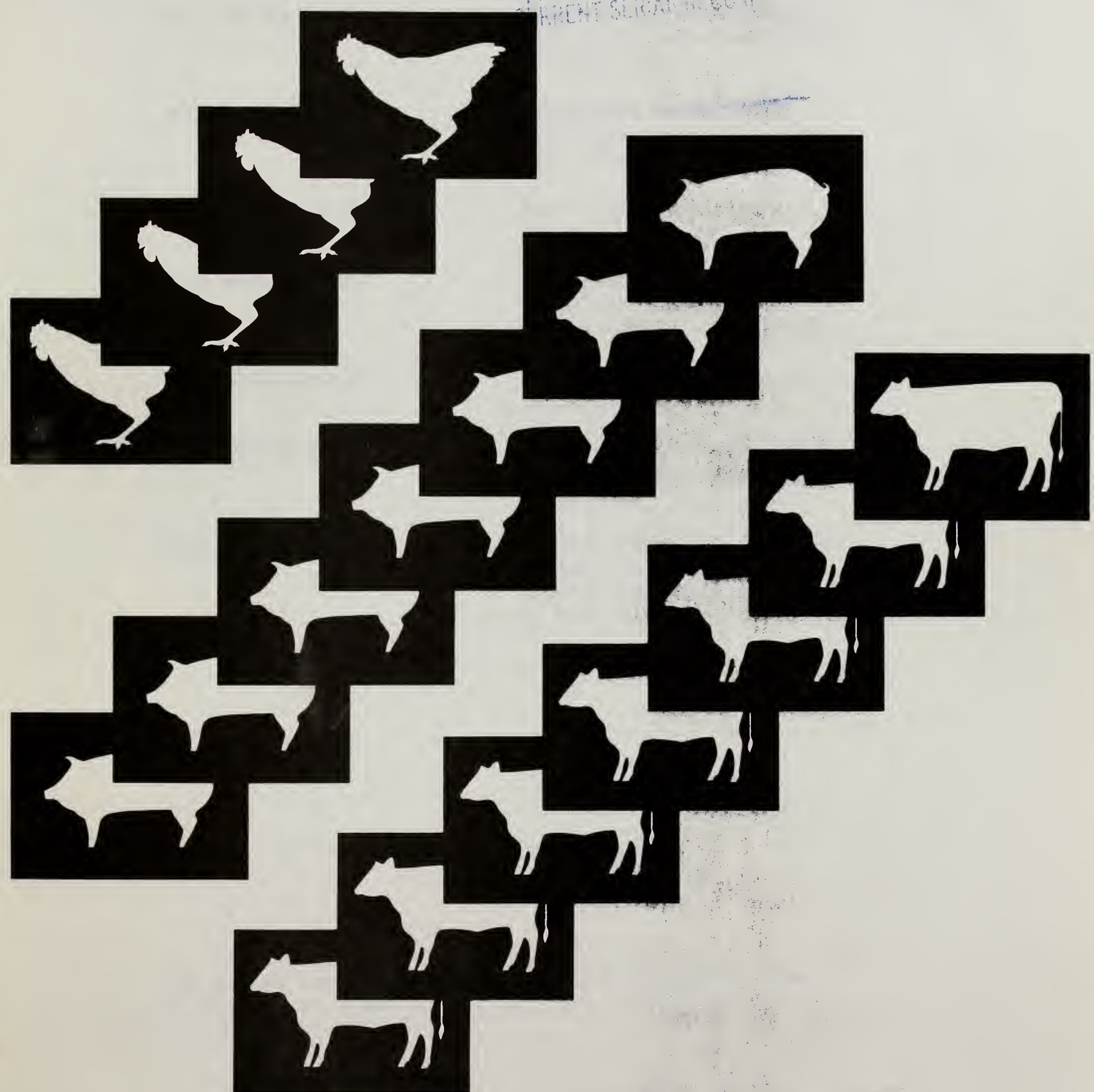
United States
Department of
Agriculture

Food Safety
and Inspection
Service

October 1984

Compilation of Meat and Poultry Inspection Issuances



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The period covered in this Issuance is August 28, 1984, to October 16, 1984.

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, D. C.

FSIS NOTICE | 58-84 | 9-11-84

ALTERNATIVE METHOD FOR CERTIFYING BEEF TO LIPC, JAPAN

The Japanese Livestock Industry Promotion Corporation (LIPC) has informed us that future LIPC tenders will allow individual packers to issue a "Certification of Conformity" for certain meat specifications in lieu of the USDA meat grader's "Agricultural Products Acceptance Certificate" specified in Section 22.51(a)(3) of the Meat and Poultry Inspection Manual.

The exporter shall provide the inspector with a copy of the tender or contract. When the tender/contract permits meat specifications to be certified by the packer and the packer chooses to make such certification, the packers specifications shall not be placed on the export certificates. The name of the product as labeled, the statement "Exporter advises shipment is/is not subject to requirements of LIPC tender" and routine items, e.g., net weights must be placed on MP Forms 130-A, 130 and 412-13.

Frozen beef for the LIPC may continue to be certified according to instructions in FSIS Notice 44-84 and Section 22.51(a)(3) of the Manual. For certification of chilled beef destined to the LIPC, refer to MPI Bulletin 83-33.

This information will be published in a FSIS directive at a later date.

Acting Deputy Administrator
Meat and Poultry Inspection Operations

DISTRIBUTION:	NOTICE EXPIRES:	OPI:
M91, M93, M94, M95, SO3, CM3	10-1-85	IP/ECD

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FSIS NOTICE | 59-84 | 9-12-84

STANDARDIZATION OF READING CAST PLATES AND
DISPOSITION OF CASES

This Notice sets forth guidelines to standardize the reading and the disposition of Calf Antibiotic Sulfonamide Test (CAST) cases.

Considerable publicity, warnings and producer assistance preceded the initiation of the CAST program. The program itself has been in operation for approximately two months and has been highly successful in controlling residues in bob calves. Significant changes are evident in treatment and withdrawal procedures for these calves. Residue Avoidance Programs and regulatory actions through CAST appear to be bringing about progressive changes and improvements. A year ago, bob calves were primarily treated with sulfonamide combinations. By mid-August 1984, it appeared that different antibiotic therapy was being used to replace the antibiotic/sulfonamide combinations. Also, the antibiotics found today are more diverse than they were a year ago. These trends in calf treatment have already affected the CAST test. CAST was developed to detect sulfonamides and antibiotics at a very low level.

Many cases show very low levels of antibiotic residues. This appears to be a result of misuse. The intent of the CAST program, however, is to detect violative levels. Therefore, a positive CAST case is one with a specific zone of inhibition so that there is concentration on gross abuse. The zone of inhibition found to be positive may be redefined at some future time to adjust to continued treatment trends and compliance histories. In conducting the CAST test, consider swabs with a zone of diffusion of 15 mm and above, as measured across, as a positive case and proceed as stated in the Self-Instructional Guide for CAST tests. Cases where such zone is less than 15 mm as measured across shall be considered insignificant and passed.

All inquiries on the test or acceptability of supplies are to be made to H.G. Fugate, Science, Microbiology Division, (202) 447-3011. If Mr. Fugate is unavailable, please contact S.S. Green (202) 447-3010.

W. S. Hoare

Acting Deputy Administrator
Meat and Poultry Inspection Operations

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FSIS NOTICE | 62-84 | 9-21-84

MARKING OF PRODUCT FOR EXPORT TO CANADA (INCLUDES "FOR FURTHER PROCESSING")

Canadian inspection officials have informed FSIS that all carcasses, portions of carcasses (including primal parts), and all livers, bovine tongues and hearts, for export to Canada, must be marked with the USDA inspection legend (small organs or parts not feasible to stamp, e.g., lamb and pork tongues, pork tails, beef kidneys, etc., are exempt from the marking requirement). This includes all product in closed containers bearing the official inspection legend and all other required labeling information.

Product for further processing is not required to be individually marked provided that the following requirements are met:

1. The shipment must be consigned directly to a Canadian registered establishment.

2. The shipping containers (including combos) must be marked "For Further Processing".

3. The truck must be sealed with a USDA seal and the seal number recorded on the export certificate. This includes all vehicles containing product for further processing, regardless of the type of shipping container. Canada prohibits alternative procedures to sealing the truck, e.g., sealing the individual shipping containers.

4. The statement "For Further Processing" must be typed in the 'Remarks' section of the export certificate.

Poultry products marked for further processing must also be exported under the above requirements. (Sealing of individual shipping cartons as specified in Section 22.24(c)(4)(iii)4 of the Meat and Poultry Inspection Manual is no longer permitted.)

All meat and poultry products bearing the marks "For Further Processing" must be shipped in sealed trucks even when the individual pieces are stamped with the USDA inspection legend.

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Exporters shall obtain Canadian and USDA label approvals for both marked and unmarked product as specified in Section 22.24 of the Manual.

This information will be included in a directive at a later date.

Acting Deputy Administrator
Meat and Poultry Inspection Operations

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
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FSIS NOTICE | 63-84 | 9-21-84

EXPORT OF ANIMAL CASINGS TO JAPAN

Japanese inspection officials have requested that FSIS issue only MP Form 415-5, Animal Casings Certificate, for the export of animal casings to Japan. Additional certifications to accompany MP Form 415-5, e.g., MP Form 415-4 or company certifications, are unnecessary and should not be issued.

Export inspectors should start issuing MP Form 415-5 immediately for casing exports to Japan.

This information will be included in an FSIS Directive at a later date.

W. S. Horne

Acting Deputy Administrator
Meat and Poultry Inspection Operations

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FSIS NOTICE | 64-84 | 10-10-84

CANADA REQUIRES OFFICIAL INSPECTION LEGEND ON CASING LABELS

Agriculture Canada has informed us that the official inspection legend is required on labels of all shipping containers of natural edible casings which are destined to Canada.

This information will be published in a FSIS directive at a later date.

Deputy Administrator
Meat and Poultry Inspection Operations

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FSIS NOTICE | 65-84 | 10-12-84

MP FORM 91, MEAT DENATURING GUIDE

This Notice cancels MPI Directive 909.7, dated December 9, 1975, which concerns MP Form 91, Meat Denaturing Guide.

MP Form 91, which was an attachment to MPI Directive 909.7, is self explanatory. It remains current, up to date, and valid. The form establishes the USDA color standard for meat from livestock denatured by black dye, charcoal, finely powdered charcoal or charcoal solution, under the provisions of the Meat Inspection Regulations (Section 325.13(a)(6)). The Guide will continue to be distributed by the Compliance Division on an as-needed basis or FSIS employees may request the form through normal supply channels.

Acting Deputy Administrator
Meat and Poultry Inspection Operations

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FSIS NOTICE | 69-84 | 10-16-84

CLARIFICATIONS TO GUIDE FOR PROTEIN FAT FREE (PFF) ANALYSIS SAMPLING PROGRAM

Recently, the Training Center issued a "Guide for PFF Analysis Sampling Program," revised July 1984. This Notice is being published to make minor correction/clarifications to that guide.

The following areas to be corrected/clarified are as follows:

A. **Introduction Page**

1. **Absolute Minimum**: Definition should read: "Three standard deviations below the minimum PFF standards."

2. **Retention Phase**: In the second sentence, third line delete the words "fail to meet," and insert: "PFF be equal to or less than".

B. **Sampling - Retention Phase** Page 5 - The flow diagram could be interpreted to indicate a processor in retention could begin to reprocess or relabel retained product without an indication of the lot average PFF. This is **not** the case. Three samples must be taken to determine the lot average PFF before any disposition of the lot.

C. **Calculations**, Page 7 -

1. Calculating PFF Gain -

The calculations in the "guide" used the Absolute Minimum to determine the reprocessed weight. This is **incorrect**. All retained PFF products must be reprocessed until the lot average PFF is equal to the PFF standard. The calculations must be based on the PFF standard. Under Calculating PFF Gain, substitute the following:

a. Determine the difference between the PFF standard (20.5) and the lot average PFF (17.3)

20.5	PFF Standard
-17.3	Lot Average PFF
3.2	Gain Required to Meet PFF Standard

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b. Multiply lot weight by 0.37% (0.0037).

10,000 lbs. lot weight
x 0.0037
37.000 lbs weight loss = .1% PFF Gain

c. Divide gain required (3.2) by 0.1 = 32

d. Multiply 27 lbs. by 32

37 x 32 = 1184 lbs. weight reduction required

e. Subtract weight reduction required (1184) from lot weight (10,000 lbs.)

10,000 - 1184 = 8816 lbs. or less reprocessed weight.

Several comments have been received regarding the need for further clarification of the flow charts on Pages 3, 4, 5, 5a and 5b. The guide will be revised at a later date and all of the above corrections and the revision of the flow charts will be incorporated at that time.

Deputy Administrator
Meat and Poultry Inspection Operations

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, D. C.

FSIS NOTICE | 68-84 | 10-16-84

QUESTIONS AND ANSWERS GUIDE TO
PROTEIN FAT FREE (PFF) REGULATION

FSIS has completed a series of informational training to provide instructions on the PFF regulation. The following training has been provided: (1) training seminars for FSIS Regional and Washington personnel, (2) industry seminars sponsored by the trade associations, (3) two training guides were published, and (4) two video tapes were produced. Following these training seminars and publication of the guides and videos, numerous questions were posed; therefore, the attached question and answer guide has been prepared in order to obtain uniform interpretation and application of the regulation.

Further questions should be directed through the Regional Director's Office.

Deputy Administrator
Meat and Poultry Inspection Operations

Attachment

DISTRIBUTION: M93, M94, M95, S03, CM3, ABB	NOTICE EXPIRES: 11-1-85	OPI: MPITS/PPID

ATTACHMENT
FSIS NOTICE 68-84

CURED PORK PRODUCTS

QUESTIONS AND ANSWERS

PPID, MPITS
FSIS

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I. LABELING AND STANDARDS

1. Question: When will Standards and Labeling Division start approving PFF labels?

Answer: Anytime. The labels for new products will be stamped on the transmittal form (FSIS 8822-1) with the statement "MUST NOT BE USED UNTIL APRIL 15, 1985." (See FSIS Notice 70-84)

2. Question: When should label applications be stamped "Requires a QC Program?"

Answer: All labels for cured pork products labeled X% of weight is added ingredients will be stamped with the QC stamp. The exception to this is when the transmittal form has a statement on it such as "THIS LABEL IS TO BE USED FOR RELABELING RETAINED PRODUCT ONLY."

3. Question: Is there a grace period to switch over to PFF labels after April 15, 1985?

Answer: No.

4. Question: How will FSIS decide when the product needs to be marked the full length?

Answer: The regulations require that if the cured pork product is not placed in a consumer size package such product shall be marked with the qualifying statement the full length of the product. To avoid questions in this regard, the transmittal form should state if it is a consumer size package. If it does not, the qualifying statement must be shown the full length of the product.

5. Question: Will starbursts be approved that refer to the product meeting the requirements of the PFF regulations?

Answer: Yes, if truthful, after January 1, 1985.

6. Question: When will qualifying statements be required and when do they have to be in the same color and style print as the product name?

Answer: Qualifying statements are needed on all products requiring terms such as "with natural juices", "water added" and "(X)% of weight is added ingredients." These qualifying statements must be part of the product name, in lettering not less than 3/8 inch in height, except on product packages of one pound or less which require print to be 1/3 the size and of the same color and style as the product name.

7. Question: What portion of the labeled product name is considered the qualifying statement for marking purposes?

Answer: That portion of the name which is in addition to the common and usual name.

Example:

Common or Usual Name	Qualifying Statement
Ham with Natural Juices	With Natural Juices
Ham Water Added	Water Added
Ham and Water Product 20% of Weight is Added Ingredients	20% of Weight is Added Ingredients

8. Question: Will plants be able to label out of trouble?

Answer: Yes, on a lot by lot basis during the retention phase.

9. Question: Will it be possible to relabel detained products rather than returning them to the official establishment?

Answer: Yes.

10. Question: Will the relabeling of canned ham be permitted?

Answer: Yes.

11. Question: How should canned, lithograph labeled product be relabeled?

Answer: The method of relabeling should be proposed by the processor for FSIS approval. For example, the product may be repackaged in consumer size containers and relabeled accurately. On consumer size cans FSIS would permit pressure sensitive stickers, if the adhesive is a type that will not permit the sticker to be removed.

12. Question: If a processor is manufacturing a water added product and the product fails to meet the standard for water added and can be relabeled as a _____ and water product-X% of weight is added ingredients, how can the X% to be shown on the label be determined?

Answer: There are several methods which can be used to determine the amount of added ingredients to be declared on the label of X% product and any of them which is adequate may be used. Some of these methods are: (1) yield determinations based on plant records such as comparisons between the green weight and the finished weight of the product; (2) use of the USDA chart (see Attachment A) for determining X% added ingredients is dependent upon laboratory analyses for PFF and fat.

13. Question: Since the PFF requlation requires a quality control program for the production of an X% product, will a processor who gets into trouble with water added product (product which does not meet the water added standard) be allowed to relabel the product as X% product without having a quality control program?

Answer: Yes. The option to relabel will be available in such cases; however, if such production becomes the rule rather than the exception, the processor may be prohibited from producing more X% product until a quality control program is approved for use.

14. Question: Can Ham and Water Product be 50% ham and 50% other ingredients?

Answer: No. A ham and water product must be more than 50% ham.

15. Question: Will labels for "ham and water product -X% of weight is added ingredients" be approved with a blank space where the percentage normally appears?

Answer: Yes, but only for relabeling purposes. The transmittal form must state that the label is only intended for use in relabeling and then only as authorized by the IIC who will determine the figure to be stamped in the space provided. The labels will not be stamped with the QC Program required stamp either.

16. Question: If a processor is currently processing a product which meets the PFF standard for a "more advantageous label," such as water added product which would meet the standard for "natural juices" product under PFF, can the processor label that product as a "natural juices" product under the PFF regulation?

Answer: Yes, after April 15, 1985.

17. Question: Can retained product be down-labeled using pressure sensitive stickers?

Answer: Yes, providing the adhesive is a type which will not permit the sticker to be removed and providing the sticker meets the applicable size/color requirements.

18. Question: Can new products be marketed before the April 15, 1985 implementation date?

Answer: No. New products (those not currently allowed by §319.104 and §319.105) cannot be marketed before April 15, 1985, but, if a processor wants to switch to the PFF compliance system for existing products before April 15, 1985, the processor may do so if all other requirements of the PFF regulation are also adopted (e.g., the labeling requirements). This policy was published in the Federal Register on August 23, 1984.

19. Question: Will the PFF values be the same for all products?

Answer: All products which are labeled with the same common and usual name (including the qualifying statement) must comply with the same standard. For example, a canned ham--water added, and a smoked ham--water added, must comply with the same PFF standard.

20. Question: What is the meaning of the term "cooked" which is used in the regulation?

Answer: The term "cooked" is used in the PFF regulation to refer to all processes where heat is applied to the product. All products labeled smoked, cooked, or fully cooked will be in the cooked category.

21. Question: If a product is heat treated for the destruction of live trichinae, why is it considered cooked by this regulation?

Answer: When a product is heated, the heating process will have a concentrating effect on the protein. Therefore, products that are heat treated are considered cooked and must meet the appropriate PFF standards.

22. Question: Is there any allowance made for the differences in protein content of fresh and PSE pork or frozen pork?

Answer: No.

II. SAMPLING

1. Question: Does an entire ham need to be taken as a sample?

Answer: One complete consumer ready unit is necessary for sampling. If that is an entire ham, an entire ham will be used as the sample. Alternative sample preparation may be used at the processors request, provided the equipment necessary for preparing the sample is available at the plant. That is, selecting a consumer ready unit, comminuting the unit, mixing the comminuted sample and selecting a one pound unit of the comminuted sample.

2. Question: Will a center slice be used as the sample unit?

Answer: Yes, but only when a center slice is being sold as the consumer unit. Since the minimum sample size submitted to the laboratory is one pound, more than one center slice may be needed.

3. Question: When the sample request directs the inspector to sample the product "ham", in a plant that produces whole hams, center slices, butts, or shank portions from the same lot, what product will the inspector sample?

Answer: All products (hams, shank portions, butt portions, and slices) produced on one shift will be treated as one lot for sampling purposes and the sample units selected will be randomly chosen, regardless of their form.

4. Question: Will the inspector take more samples during periodic sampling at the processors request?

Answer: No.

5. Question: Will the computer make a determination as to which product will be sampled?

Answer: Yes, but with alternatives from the same Group. In the event the products or alternatives are not available, the forms will be returned to Washington, D.C. and products from other Groups will not be sampled.

6. Question: If only a partial lot is available for sampling, will the results of the sampling be included in the determination of the Group/Product Values?

Answer: Yes.

7. Question: What does the term "periodic" mean as it applies to the sampling rate?

Answer: "Periodic" sampling means sampling at a rate other than daily. All plants will start in periodic sampling.

8. Question: At what point in the process will a PFF product be sampled?

Answer: When it is ready to enter commerce, e.g., as a finished consumer unit.

9. Question: Does a sample represent all of the product produced in all Groups?

Answer: No. During periodic and daily sampling, it represents the Group from which it was selected.

10. Question: Will sampling be increased during holiday periods?

Answer: Sampling rates are based on sample results, -- good results mean less sampling, bad results mean more sampling, however production volume will enter into the decision process for sampling frequencies.

11. Question: For sampling purposes, should processors be encouraged to grind their samples rather than submitting a whole product unit as a sample?

Answer: No. The processor should be made aware of the opportunity to prepare (chop) the entire consumer ready unit so the inspector may choose a one pound sample unit from the product; but, the processor should also understand that the sampling and the sample preparation must be under the inspector's supervision.

12. Question: Can the results from one sample put the plant into retention?

Answer: Yes, if that Sample PFF Value is equal to or less than the Absolute Minimum or if the Sample Value causes the Group Value and Product Value to fall below the Action Limits.

13. Question: Will plants be allowed to devised a sampling plan for the retention phase which is different than the one which is included in the regulation?

Answer: Yes. The sampling plan must be as effective as the one specified in the regulation and must be approved by the Administrator prior to its use during the retention phase.

14. Question: Will a Group Value be maintained for ham patties?

Answer: Yes. All products under the purview of this regulation will have a Group Value and a Product Value.

15. Question: What is the PFF line?

Answer: This is a toll free telephone number for use by FSIS personnel only. The purpose of the line is to 1) assist inspectors in verifying their PFF calculations when samples sent to an accredited laboratory indicate an Absolute Minimum violation, 2) notify the inspector of a "Absolute Minimum violation, 3) notify the inspector of the need for initiating daily sampling or retention, 4) verify the accuracy of an inspector's calculations indicating an Absolute Minimum violation, or 5) verify that retention may be discontinued. This line is not to be used for obtaining information on program policies. All policy questions are to be directed through normal channels.

16. Question: Will steam cooked product be placed in the same Group as water cooked product?

Answer: Yes, if they are packaged the same.

17. Question: If a processor is producing a boneless cooked ham in an impervious casing, would it be considered to be a Group I product?

Answer: Yes. Any product which is imperviously encased, would be Group I product no matter whether it is canned, in an impervious nylon casing, or in a plastic cook-in bag.

18. Question: If one product goes into retention, can it be removed from the Group and monitored separately?

Answer: Yes. If the average production rate of the product over the 8-week period preceeding the week in which the retention occurred, is not greater than 20% of the rate of production of its Group.

19. Question: Can the inspector take action based on Product or Group Value results without input from the computer?

Answer: No. The inspector is not expected to keep track of the Product Values or the Group Values and will not take any action on Product Values or Group Values unless the action is initiated by the computer.

20. Question: If a processor keeps track of the Product Values and the Group Values, will the processor be able to determine when retention of any given product is coming?

Answer: Yes. It is recommended that the processor keep informed of the Product Values and the Group Values as determined by FSIS.

21. Question: If the processor maintains Group Value and Product Value charts with or without computer assistance, should the inspector use the processor's charts?

Answer: No.

22. Question: If a processor is producing several Groups of products and one Group goes into daily or retention phase sampling, how will this affect the sampling of the other Groups?

Answer: It will not.

23. Question: Will processors receive Group and Product Value charts as part of the information on the status of their compliance?

Answer: The generation of charts for the Group and Product Values is certainly possible, but the exact form of reports to be made available to processors has not been decided at this time. The inspector will be provided information about the status of the compliance of lots and the status of the Group Values and Product Values and how those values affect the compliance status of products and processors. The inspector will share this information with the processor.

24. Question: Will the inspectors be doing any of the calculations associated with PFF compliance?

Answer: Yes. In plants using accredited laboratories, the inspector will be expected to determine the PFF of the sample, and determine if the PFF of the sample is equal to or below the Absolute Minimum PFF. The inspector will also be expected to determine the lot average PFF on retained lots and compare them to the applicable standards to determine it the retained product may be released or if it needs to be reprocessed or relabeled.

25. Question: What does "like product" mean?

Answer: "Like product" is product within the same group, meeting the same PFF standard, and bearing the same common and usual name.

26. Question: Are all boneless hams, even though the boneless hams may represent different quality levels, net weights, and brand names, considered to be a single product?

Answer: Yes. All products which are in the same Group and labeled with the same common and usual name are considered "like product."

27. Question: What is the purpose of grouping?

Answer: The grouping of similarly processed products allows FSIS to monitor the process used to produce those products rather than checking the process on a lot by lot basis.

III. RETENTION

1. Question: If a product is in retention and the Product Value is equal to or greater than zero, and all other parameters for getting out of retention are satisfied, but the variability of the process is still high, will the product remain in retention?

Answer: No.

2. Question: What is the turn around time expected on the approval of sampling procedures which are intended as alternatives to the sampling procedure for retained product provided by the PFF regulation?

Answer: FSIS is not prepared to commit to a specific time frame. However, undue delays will not be tolerated.

3. Question: If a regular ham was found to be out of compliance with the standard and retention was initiated, would it affect the compliance of the water added hams?

Answer: No.

4. Question: Will the three samples taken during retention to estimate the lot average PFF be analyzed for PFF independently or will they be composited?

Answer: Independently.

5. Question: Will the variability among the three separate samples from the retained lot be evaluated and used?

Answer: No.

6. Question: How will the three samples taken from retained lots be evaluated?

Answer: The average of the three samples will be used for determining the disposition of the lot. The average will be entered into the appropriate Product and Group Value calculations. The PFF analyses of the individual samples will be compared to the Absolute Minimum requirement, and utilized to determine when the product returns to daily sampling.

7. Question: During retention, does the five lot minimum reflect five day's production or five shift's production?

Answer: Five consecutive shifts.

8. Question: Will FSIS recall products based on retail samples?

Answer: This is an option for any misbranded or adulterated product. To learn more about the Department's procedures concerning voluntary recall, FSIS Directive 8080.1 should be obtained from the Emergency Program Staff, FSIS, U.S. Department of Agriculture, Washington, D.C.

9. Question: Once the inspector has determined that the sample PFF is equal to or less than the Absolute Minimum, will the inspector begin retention activities?

Answer: Yes. In addition, the inspector will have the responsibility to retain product if there is any reason to believe that the product is misbranded or adulterated.

10. Question: If a processor produces both canned ham and regular smoked ham, and one of the two goes into retention, will they both be placed under retention?

Answer: No. These two products belong to different groups as defined by the regulation and the retention of one does not cause the retention of the other.

11. Question: If the sample results on a lot indicate it should be retained, but the lot has already been shipped, will the lot be recalled?

Answer: The lot will be subject to recall but will not necessarily be recalled if compliance can be assured by alternative methods, e.g., relabeling.

12. Question: What happens when the PFF of a sample is equal to or less than the Absolute Minimum?

Answer: The lot which is represented by the sample is retained and each subsequently produced lot of like product is placed under retention. Each lot average PFF will be determined and a decision on release, reprocessing or relabeling, made.

13. Question: During retention of a product with four labels, how would the inspector sample the products? Would product with each of the four labels be sampled?

Answer: Three samples are randomly selected under the retention phase. Therefore, not all labels will be sampled.

14. Question: If a processor's product goes into retention, can the PFF result (a single sample) that triggered the retention be the basis for calculating the shrink needed to bring the lot into compliance?

Answer: Once retention is triggered, a three sample average will be necessary to determine an accurate lot average PFF upon which to base the decision on the disposition of the product; however, sampling alternatives will be considered if shown to be valid.

15. Question: What happens if product is retained on April 14, 1985; i.e., will it be under PFF retention?

Answer: No. Product which fails to meet existing regulations on April 14, 1985 will be retained until it meets the added water and added substances requirements.

16. Question: How can retained product be released?

Answer: It must be sampled to determine the lot average PFF and may be released only if the lot average PFF is equal to or higher than the standard, otherwise it may be reprocessed until it meets the standard or relabeled.

17. Question: If a retained lot has been sampled and one of the three samples is below the Absolute Minimum, but the lot average PFF equals the standard, will the lot be released?

Answer: Yes. Compliance of the retained lot is based upon the lot average PFF as determined by the three sample average. The three sample average must be equal to or higher than the applicable standard. However, the sample which is equal to or less than the Absolute Minimum could delay the return to the daily and periodic sampling phases from the retention phase.

18. Question: When a processor's product has entered the retention phase and one or more lots in the processor's storage facility have already been partially shipped, will the lot average PFF be determined from the partial lots which are available in the storage facility or will the remainder of the partial lots be recalled and then the lot average PFF determined on the reassembled lot?

Answer: When part of a retained lot has been shipped and the shipped portion of the lot has been consumed or cannot be located, the partial lot, which is under retention, will be treated as if it were the entire lot. If the shipped portion can be located, a sampling procedure will be devised to ensure that the entire lot is sampled to determine the lot average PFF.

19. Question: If canned ham is retained can it be reprocessed or relabeled?

Answer: Yes.

IV. ADDED PROTEINS

1. Question: How will the added proteins be identified as added proteins?

Answer: By the inspector in the plant knowing about the addition of the protein containing ingredients and reporting them to the laboratories.

2. Question: How will the meat protein content of a additive be determined when the inspector can not determine the protein content of the additive?

Answer: The inspector will inform the laboratory of the quantity of the additive used and that the protein level is unknown. The laboratory will deduct the highest amount of protein which is known to exist in the additive being used.

3. Question: If the protein content of an additive varies; or an additive is reformulated to include more or less protein than the original formula, how will the inspector know which level of protein to report to the laboratory?

Answer: The processor is responsible for notifying the inspector if the protein content changes. The inspector will inform the laboratory of the additive and the percentage content of protein. In addition, the inspector may request the laboratory to do a protein analysis on the pickle.

4. Question: If 0.5% protein is added to a cured pork product would 0.5% protein be deducted from the total protein to obtain the meat protein used in calculating the PFF?

Answer: All non-meat proteins are deducted on a finished product basis. Although unlikely, more than 0.5% may be deducted if the finished product yield is less than the green weight.

5. Question: If a protein containing additive is used in a cured pork product and the label of the additive includes a statement as to the percent protein contained in the additive, will the label statement be accepted as a declaration of protein content?

Answer: Yes, but that does not mean the inspector may not occasionally sample.

6. Question: If the processor does not use any protein additives, should the inspector note smokehouse and cooler shrink on the MP Form 6200-1?

Answer: No.

7. Question: Will FSIS require plants to certify the amount of protein in added ingredients?

Answer: No. The inspector will record the amount of the added ingredients containing proteins used in the products and the percent of protein found in the added ingredient if it is available. If the amount of protein in the added ingredient is not available to the inspector, the laboratory will deduct the maximum percent of protein normally found in that ingredient.

8. Question: How will protein containing flavorings added to curing solutions be detected by the compliance system and subtracted from the total protein to provide the meat protein content?

Answer: All additives which contain protein--including flavorings--will be reported to the laboratory by the inspector and noted on the FSIS 6200 so that they may be deducted from the total protein as added proteins. Sampling of additives in a pickle may occassionally be necessary.

9. Question: Will any credit for the loss of protein during cooking be allowed by the PFF regulation?

Answer: No.

10. Question: Would the reporting of added protein in grams be more accurate than the reporting of added protein in pounds?

Answer: Not necessarily, however, reporting in grams, pounds or ounces would be acceptable.

V. QUALITY CONTROL

1. Question: Can a quality control program be established in a plant without having a quality control laboratory in the plant?

Answer: Yes.

2. Question: How often is sampling of products required in a quality control program?

Answer: There has not been any establishment of guidelines on the frequency of sampling in a PFF quality control program. Sampling frequencies must take into account such things as type of in-process controls, volume, variability, product lines, etc.

3. Question: How will the X in the X% product be controlled?

Answer: By formulation and yield. However, laboratory analysis may supplement the control program.

4. Question: If a product was labeled as "X%" of weight is added ingredients," will variation be allowed around the "X%?"

Answer: Some variation around the "X%" will be allowed.

5. Question: Will guidelines on the preparation of a PFF quality control program be available for use and distributed to industry?

Answer: Yes. Copies are available from the regional offices.

6. Question: Will a processor who has an approved quality control program be included in the FSIS monitoring system specified in the PFF regulation?

Answer: No.

7. Question: Can the yield data be used as part of the process control rather than the compliance system established by the regulation?

Answer: Yes, if it is part of a approved QC program. Occassional verification sampling will be necessary.

8. Question: Will the control methods used in the PFF regulation be adequate for use in a quality control program?

Answer: The approaches used in the PFF regulation would be acceptable for use in the TQC system or a PQC program, but the system used in the PFF regulation is a monitoring system and not a control system. So, a quality control program which mimics the PFF regulation would not be adequate to control a process and would not be acceptable.

9. Question: Who will handle sampling for a TQC plant?

Answer: The plants, with one expection, i.e. the inspector may select verification samples to monitor the QC activity.

10. Question: When can a new TQC system or partial QC program, or a revision of a TQC system or a partial QC program, be approved and implemented?

Answer: Both can be approved anytime. See FSIS Notice 29-84.

11. Question: What are the advantages of having a PQC program or a TQC system for cured pork products?

Answer: The main advantage to the processor is the chance to set up and monitor their compliance with the standards of the PFF regulation by use of a quality control system designed specifically for their plant. Other advantages may be less interference in the day-to-day operations of the plant and the satisfaction of assuming the responsibilities of compliance and quality control.

12. Question: Can data collected on past production be used to document the adequacy of a quality control system or program?

Answer: Yes, if the process is unchanged.

13. Question: Will product produced under a quality control system or program be recalled if it is found to be out of compliance?

Answer: All noncomplying product is subject to recall.

VI. LABORATORIES

1. Question: What is the turn around time for samples submitted to an FSIS laboratory?

Answer: Approximately two weeks. This is about the same time as analyses for added water and added substances.

2. Question: If a yield test indicates the product is in compliance but the laboratory results indicate that the product is not in compliance, which result takes precedence?

Answer: The laboratory result takes precedence under the PFF compliance system.

3. Question: Will processors be allowed to use accredited laboratories for fat and protein analyses?

Answer: Yes.

4. Question: Will inspectors receive results from the accredited labs?

Answer: Yes. The information flow between the inspector and the accredited labs will not change.

VII. IMPORTS

1. Question: Are imported products to be subject to the same PFF standards?

   Answer: Yes.

VIII. EXEMPTION

1. Question: Are cured pork products prepared under custom exemption subject to the PFF regulation?

Answer: No, because these products do not carry the mark of inspection.

2. Question: Are cured pork products prepared under retail exemption subject to the PFF regulation?

Answer: No, because these products do not carry the mark of inspection.

IX. STATE PROGRAMS

1. Question: How will the PFF regulation affect state inspected plants?

Answer: All cured pork products produced in state plants must comply with the PFF standards.

2. Question: What does a state plant need to do to be part of the PFF directed sampling and compliance system?

Answer: They need to complete a State Production Volume Information Survey and contact their State Director.

X. PRODUCTS COVERED

1. Question: Are "canned deviled ham, or ham loaf, and ham sausage" covered by the PFF regulation?

Answer: No. The only comminuted products covered by the PFF regulation are those labeled as "ham patties," "chopped ham", "pressed ham," and "spiced ham"

2. Question: Are country hams, dry cured hams, and other dry cured pork products covered by the PFF regulation?

Answer: No.

3. Question: Are bacon and miscellaneous cured pork products such as hocks, ears, snouts, feet, knuckles, tails, fat back and jowls covered by the PFF regulation?

Answer: No.

4. Question: Will PFF control for cured pork products lead to other products being controlled in the same manner?

Answer: The agency is currently gathering data which could lead to the application of the PFF concept to other processed products.

XI. OTHER

1. Question: Can data collected in the past be used to estimate the average PFF and variability of a processor's processes?

Answer: Yes. If a processor has the meat protein content and the fat content on past products and the process has not been changed, the information on past production should give a good indication of the average PFF and variability associated with the process.

2. Question: Will processors need to continue submitting processing procedures for cured pork products to the inspector as they have under the current regulation?

Answer: Yes. The inspector must have the processing procedures to monitor the use of restricted ingredients and processing requirements.

3. Question: How will the inspector be trained?

Answer: Extensive training has been completed for regional staff officers. Regional offices are training supervisory personnel. Moreover, the Agency has developed two instructional guides on PFF. One provides a general overview on the PFF regulation. The other guide explains the sampling program. In addition, two video tapes have been produced and are available.

4. Question: How does the computer directed sampling procedures used for PFF compare to the computer directed sampling used for bacon nitrosamines?

Answer: The system for PFF is modeled after the nitrosamine sampling system and is similar in that it is designed to select random samples based on the variables fed into the system.

ATTACHMENT
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ATTACHMENT A

TABLE TO DETERMINE X% ON RETAINED PRODUCT LABEL WHEN FAT AND PFF ARE KNOWN

%FAT	PFF 10.0	10.5	11.0	11.5	12.0	12.5	13.0	13.5	14.0	14.5	15.0	15.5	16.0	16.5
UP TO 0.5	35	35	35	35	30	30	30	30	25	25	25	25	20	20
3.5	35	35	35	35	30	30	30	30	25	25	25	20	20	20
4.0	35	35	35	30	30	30	30	30	25	25	25	20	20	20
8.5	35	35	35	30	30	30	30	25	25	25	25	20	20	20
9.0	35	35	30	30	30	30	30	25	25	25	25	20	20	20
10.0	35	35	30	30	30	30	30	25	25	25	20	20	20	20
13.0	35	35	30	30	30	30	25	25	25	25	20	20	20	20
15.5	35	30	30	30	30	30	25	25	25	25	20	20	20	15
16.5	35	30	30	30	30	25	25	25	25	25	20	20	20	15
17.0	35	30	30	30	30	25	25	25	25	20	20	20	20	15
20.5	30	30	30	30	30	25	25	25	25	20	20	20	20	15
22.0	30	30	30	30	25	25	25	25	25	20	20	20	20	15
22.5	30	30	30	30	25	25	25	25	25	20	20	20	15	15
25.0	30	30	30	30	25	25	25	25	20	20	20	20	15	15
28.0	30	30	30	25	25	25	25	25	20	20	20	20	15	15
28.5	30	30	30	25	25	25	25	20	20	20	20	20	15	15
29.5	30	30	25	25	25	25	25	20	20	20	20	20	15	15
32.0	30	30	25	25	25	25	25	20	20	20	20	15	15	15
32.5	30	25	25	25	25	25	25	20	20	20	20	15	15	15
35.5	30	25	25	25	25	25	20	20	20	20	20	15	15	15
36.5	25	25	25	25	25	25	20	20	20	20	15	15	15	15
40.5	25	25	25	25	25	20	20	20	20	20	15	15	15	15
41.0	25	25	25	25	20	20	20	20	20	20	15	15	15	15
43.5	25	25	25	25	20	20	20	20	20	15	15	15	15	15
45.0	25	25	25	20	20	20	20	20	20	15	15	15	15	15
45.5	25	25	25	20	20	20	20	20	20	15	15	15	15	10
46.5	25	25	25	20	20	20	20	20	15	15	15	15	15	10
49.0	25	25	20	20	20	20	20	20	15	15	15	15	15	10
50.0	25	20	20	20	20	20	20	15	15	15	15	15	15	10